

Congress of the United States
Washington, DC 20515

October 22, 2007

Ms. Rosa Meehan
Supervisor
U.S. Fish and Wildlife Service
Polar Bear Project Leader
Marine Mammals Management Office
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, Alaska 99503

RE: Comments on the Proposal to List the Polar Bear as a Threatened Species (72 Fed. Reg. 53749-53751)

Dear Dr. Meehan:

The U.S. Geological Survey (USGS) has generated new scientific models which, under current conditions, suggest an even more precarious future for polar bears since the initial filing to list the polar bear as a threatened species under the Endangered Species Act (ESA) in 2005 and the Fish and Wildlife Service's (FWS) proposal to list the polar bear as threatened in January. The nine reports by scientists at USGS this month show that the polar bear is in danger of extinction in most of its range. We believe that these new findings indicate that the polar bear should be listed as endangered under ESA.

We appreciate that in considering a final rule, the service requested that the USGS investigate a number of scientific questions relating to polar bears and their sea ice habitat. The USGS conducted these investigations using existing and new observational data and scientific models. Based on this substantial and rigorous effort, as documented in the nine new reports, the USGS has significantly advanced the understanding of sea ice loss and its implications for polar bears.

The USGS has concluded that polar bears will almost certainly disappear entirely from Alaska by the middle of this century, and that we will have lost fully two-thirds of the world's polar bears by this time. The good news is that polar bears may survive in the high Canadian archipelago and portions of Northwest Greenland through the end of this century. However, the risk of extinction for these polar bear populations by the end of the century is still unacceptably high: over 40 percent in the archipelago over 70 percent in Northwest Greenland, under sea ice conditions forecast by the climate models used in the study.

Ominously, new observational data from this summer show that the actual decline of Arctic sea ice, on which polar bears depend, is underestimated by all currently available models. This suggests that these are conservative estimates and that Polar Bear habitat will likely decline even more quickly than the models project.


The ESA defines an endangered species as "any species which is in danger of extinction throughout all or a significant portion of its range" and a threatened species as "any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Under the current circumstances, we believe the polar bear simply must be listed as endangered rangewide.

While the conclusions of the USGS reports are cause for immediate concern and actions to protect polar bears, they are not cause for despair. The USGS study focused on the A1B "business as usual" Intergovernmental Panel on Climate Change ("IPCC") scenario of future emissions, in which atmospheric carbon dioxide concentrations are assumed to reach 717 parts per million by 2100. The study did not consider a scenario in which greenhouse gas emissions are capped at a much lower level. Stated simply, "business as usual" emissions will drive polar bears to extinction with near certainty, but it is not too late to preserve them if we act now.

Given the perilous status of polar bears in Alaska, we also must maximize the protection of their habitat. We are concerned that the Department of the Interior is moving forward with five lease sales in the Beaufort and Chukchi Seas, in polar bear habitat, through its Outer Continental Shelf (OCS) Oil and Gas Drilling Program for 2007-2012. We believe that any further commitments to fossil fuel development in polar bear habitat should be put on hold until the Fish and Wildlife Service has issued a final listing determination for the polar bear under the ESA.

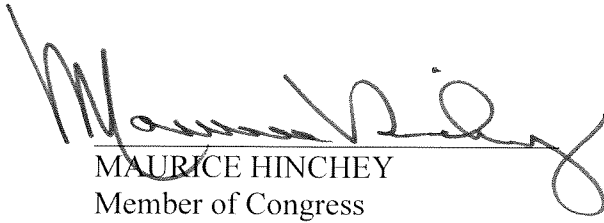
Thank you for providing us with the opportunity to comment on the new data. As you know, the best available science on polar bears and their sea-ice habitat has improved since the initial petition was filed two years ago and there is ever-increasing evidence that the continued existence of the polar bear is endangered. We strongly urge you in this ruling to continue to adhere to the ESA's mandate to consider *solely* the best available scientific evidence and not to allow politics to enter this process. We appreciate your serious attention to this important matter.


Sincerely,


JAY INSLEE
Member of Congress
CHRISTOPHER SHAYS
Member of Congress

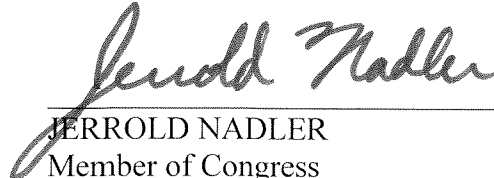

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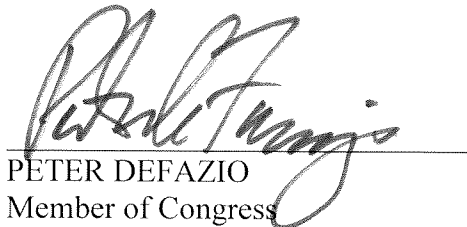

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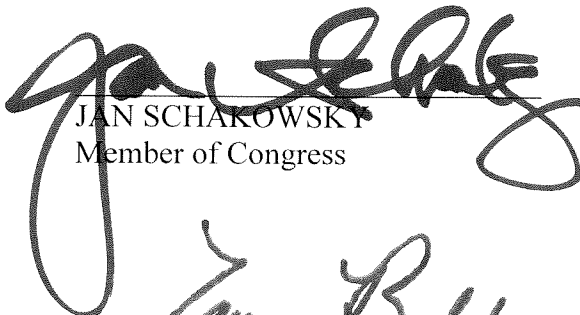

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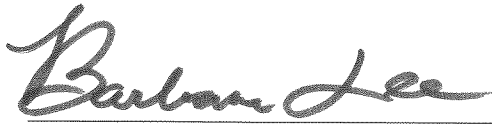

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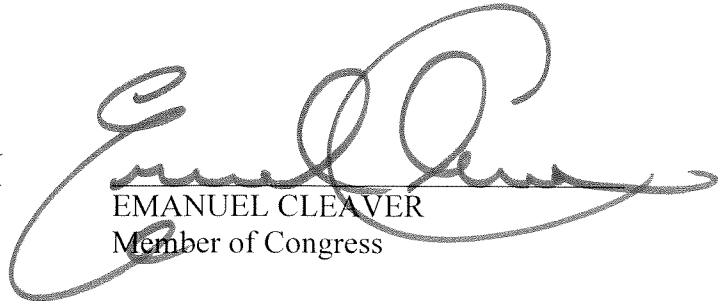

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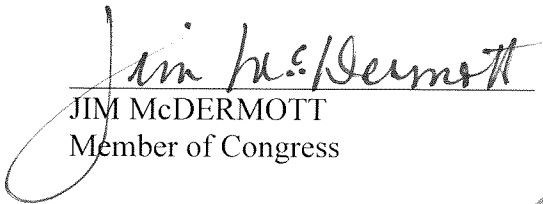
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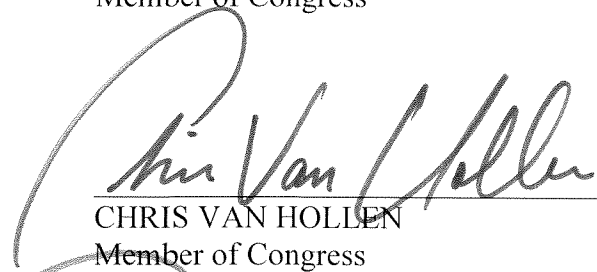
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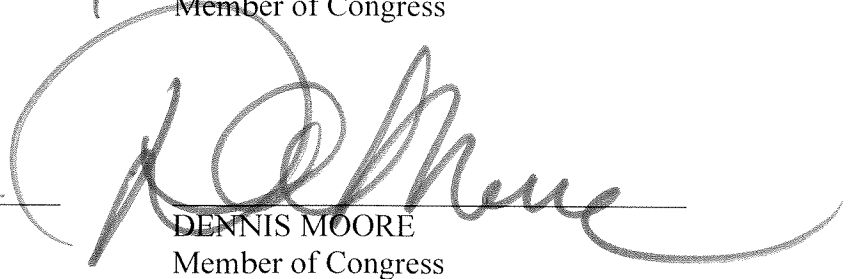
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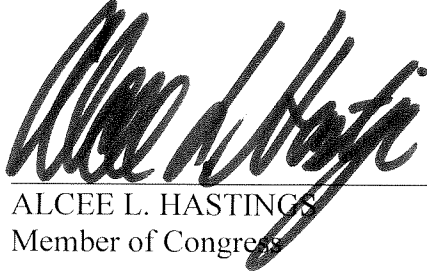
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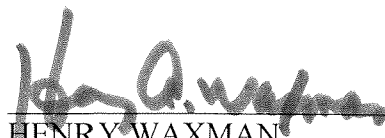
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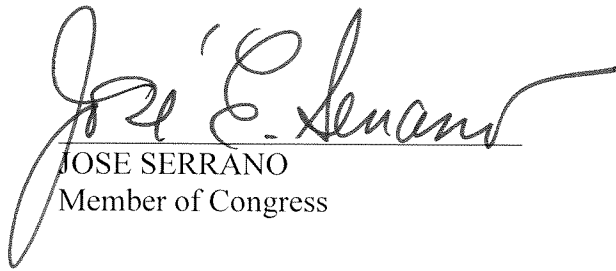
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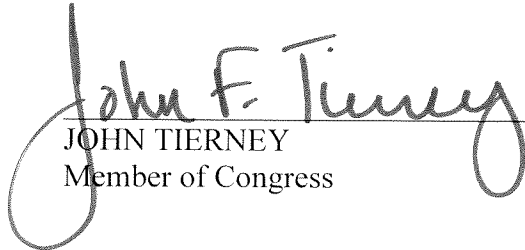
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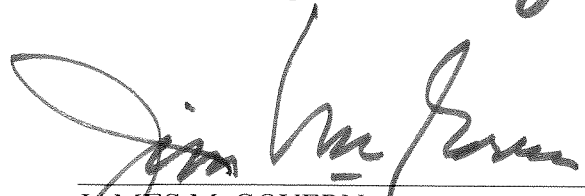

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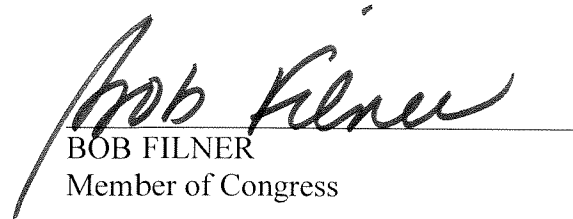

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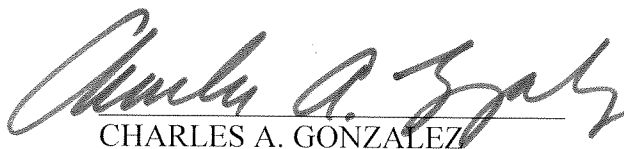

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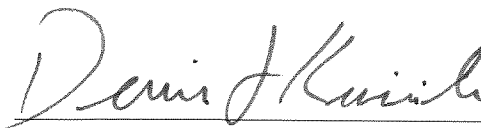

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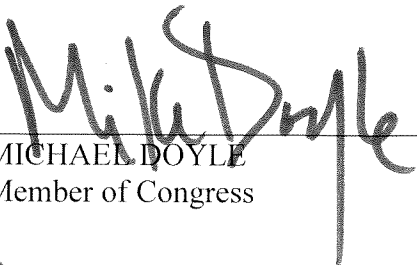

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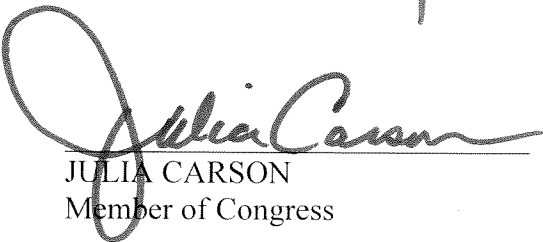

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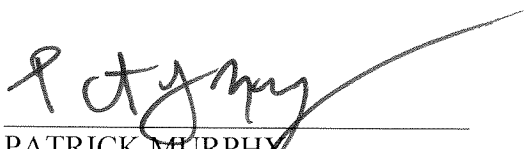

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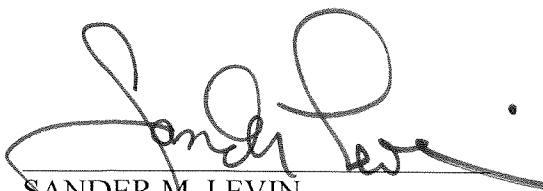

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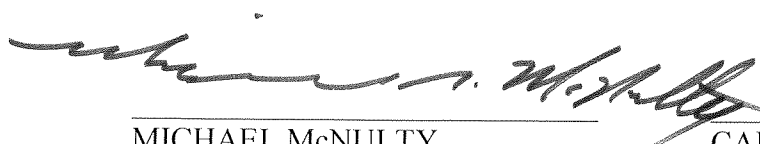

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LORETTA SANCHEZ
Member of Congress

cc: The Honorable Dirk Kempthorne
Secretary of Department of the Interior

cc: The Honorable Dale Hall
Director of Fish and Wildlife Service